

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 1:18-cv-00091**

SHARON K. WHITEHEAD, Individually)
and as Executrix of the Estate of)
JAMES T. WHITEHEAD, Deceased,)
)
Plaintiff,)

v.)

AIR & LIQUID SYSTEMS CORPORATION,)
individually and as successor-in- interest to)
BUFFALO PUMPS, et al.,)
)
Defendants.)

DEFENDANT VIKING PUMP, INC.’S
MOTION FOR SUMMARY JUDGMENT

NOW COMES the Defendant Viking Pump, Inc. (hereinafter “this Defendant”), by and through its undersigned counsel, and respectfully moves the Court pursuant to Rule 56 of the Federal Rules of Civil Procedure for an order granting summary judgment to this Defendant on grounds that there is no genuine issue of material fact and insufficient evidence to support Plaintiff’s causes of action against this Defendant, therefore, this Defendant is entitled to judgment as a matter of law on all claims asserted in Plaintiff’s Complaint. In support of this Motion, this Defendant respectfully requests the Court consider its Memorandum of Law (and exhibits) filed contemporaneously herewith, which are incorporated by reference herein.

WHEREFORE, Defendant Viking Pump, Inc. prays the Court grant summary judgment and award any other further relief that this Court deems proper.

Respectfully submitted this the 16th day of March. 2020.

DEAN & GIBSON, PLLC

By: /s/ Amy. C Drayton

Amy C. Drayton

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Attorney for Defendant Viking Pump, Inc.

CERTIFICATE OF SERVICE

I, Amy C. Drayton, hereby certify that a true and correct copy of the foregoing has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

This the 16th day of March, 2020.

DEAN & GIBSON, PLLC

By: /s/ Amy. C Drayton

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